



Air Transport Association

*cc: B-12*

February 8, 1995

Mr. Anthony J. Broderick  
Associate Administrator, Regulation & Certification (AVR-1)  
Federal Aviation Administration  
800 Independence Avenue, S.W.  
Washington, D.C. 20591

Dear Tony:

The Aviation Rulemaking Advisory Committee (ARAC) met on February 7 to consider a final recommendation from the Parts Approval Action Team (PAAT) - Phase III Working Group. ARAC failed to achieve consensus regarding the recommendation, with all manufacturing members voting "no" or abstaining. The actual vote was nine "yes," three "no," and three abstentions. A copy of the recommendation, which includes minority reports and rationale for the "no" votes, is attached. A copy of a letter from McDonnell Douglas Helicopters is also attached, which contains additional information about alternative solutions which was not provided to the working group.

Manufacturers indicated there is a good probability that they could achieve consensus if the FAA were to provide additional information about an overall approach to parts issues, including surplus parts, enforcement of existing rules, new regulatory requirements and special or particular rules for rotorcraft. I understand that work may already be underway within the Agency to define such an approach.

On behalf of ARAC, I would like to invite principal members of the Flight Standards and Aircraft Certification Services to discuss the parts issue with ARAC when it next meets to address maintenance issues, on April 27, 1995, here at ATA. A later meeting of ARAC could also be employed for this purpose if an Agency position has not been fully developed by April. Please let me know how you would like to proceed.

ARAC has chosen to address this issue itself, to facilitate discussions with FAA principals. At the same time, ARAC voted today to disband the PAAT Phase III Working Group, because its work is complete. ARAC expressed sincere appreciation to the working group members, and particularly to the chair, Howard Aylesworth of AIA, for a commendable effort to develop a "fast track" recommendation.

Mr. Anthony J. Broderick  
February 8, 1995  
Page Two

I look forward to hearing from you on this matter in the days ahead.

Sincerely,

A handwritten signature in cursive script that reads "Steven R. Erickson". The signature is written in black ink and is positioned above the printed name and title.

Steven R. Erickson  
Assistant ARAC Chair  
Air Carrier/General Aviation  
Maintenance Issues

Attachments

cc: Jim Casey, ATA  
Howard Aylesworth, AIA  
Fred Leonelli, FAA (AFS-300)  
Al Michaels, FAA (AFS-330)  
Barbara Herber, FAA (ARM-205)